UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Criminal No. 18-120 (ADM/KMM)

United States of America,

SUPPLEMENTAL MOTION TO

SUPPRESS

Plaintiff, **EVIDENCE OBTAINED AS A**

RESULT OF SEARCH AND SEIZURE

v.

Dwight Frederick Barnes,

Defendant.

The Defendant, Dwight Frederick Barnes, by and through his attorney, Andrew S. Garvis, respectfully moves the Court pursuant to Rule 12, Federal Rules of Criminal Procedure, to suppress any physical evidence obtained as a result of a search and seizure on the following grounds:

That the Wells Fargo search warrant issued for Mr. Barnes and Life Changing Finances to Freeze any and all Assets was without requisite probable cause and the records were obtained in violation prior to issuance of a search warrant. *United States v. Brown*, 634 F.3d 435, 438 (8th Cir. 2011)

This motion is based on the indictment, the records and files in the above-entitled action, and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Dated: November 15, 2018 Respectfully submitted,

s/ Andrew S. Garvis
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